

4/11/06

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATE OF AMERICA )  
 )  
vs. ) No. 02-CR-30043-05-MAP  
 )  
MICHAEL QUICKEL, )  
Defendant )

**DEFENDANT'S MOTION TO CONTINUE SENTENCING HEARING**

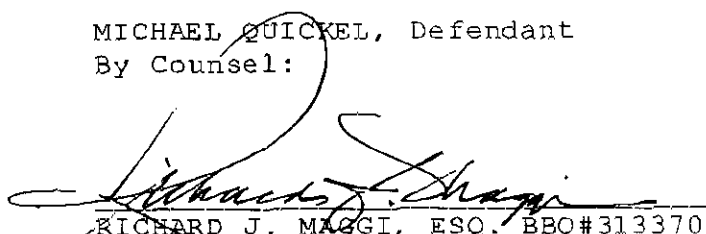
Defendant moves this honorable Court to continue the hearing on his sentencing, presently scheduled for April 18, 2006, to a later date.

As grounds, Defendant states that his counsel is on trial that date in Westfield District Court, for a defendant who has been held since July of 2005, and that counsel cannot continue the trial due to the length of time the defendant has been held.

The U.S. Attorney does not object to allowance of this request.

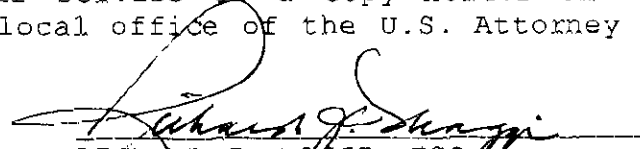
Respectfully,

MICHAEL QUICKEL, Defendant  
By Counsel:

  
RICHARD J. MAGGI, ESQ. BBO#313370  
P.O. Box 432  
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**CERTIFICATE OF SERVICE**

I hereby certify to proper service of a copy hereof on the Government by facsimile to the local office of the U.S. Attorney on April 11, 2006.

  
RICHARD J. MAGGI, ESQ.